

Kathleen Hartnett White, *Chairman*
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received
11-28-06

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 15, 2006

Ms. Raji Josiam, RPM
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue
Dallas, TX 78202-2733

Re: Supplemental Groundwater Characterization Report
South Cavalcade Superfund Site

Dear Ms. Josiam:

The Texas Commission on Environmental Quality has completed review of the Supplemental Groundwater Characterization Report for the South Cavalcade Superfund Site (Key Environmental, Inc. March 2006). This report summarizes the additional characterization performed to meet the project objectives as specified in the Supplemental Groundwater Characterization Work Plan (August 2005). It is our understanding that the content of this report was expanded to include an evaluation of the dense non-aqueous phase liquid (DNAPL) recovery record and presentation of the technical basis for discontinuing recovery, if appropriate. Please extend our appreciation to Key Environmental, Inc., for providing extra copies of the Groundwater Fate and Transport Evaluation Report (GFTER) and Verification of Groundwater Fate and Transport Evaluation (VGFTER) to facilitate our review of the referenced reports.

We generally agree that the additional characterization supports the recommendation in the GFTER/VGFTER for the incorporation of monitored natural attenuation as a component into the groundwater remedy in the shallow groundwater bearing zone. However, we would like to further discuss the concept with you regarding the intermediate groundwater bearing zone. Finally, based on the data presented, we do not agree that DNAPL recovery operation should be permanently discontinued at this time. Enclosed are our comments from our review of the report.

If you should have any questions or concerns, please contact me at (512) 239-2443.

Sincerely,

Fay Duke, Project Manager (MC 221)
Team 2, Environmental Cleanup Section II
Remediation Division

FD/mn/ts

Enclosure



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